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*Attorneys for Defendant Zuffa, LLC, d/b/a
Ultimate Fighting Championship and UFC*

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA - SAN JOSE DIVISION

Cung Le, Nathan Quarry, Jon Fitch, on behalf
of themselves and all others similarly situated,

Plaintiffs,

v.

Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,

Defendant.

Case No. 5:14-cv-05484 EJD

**STIPULATION AND [PROPOSED]
ORDER STAYING DISCOVERY
PENDING RESOLUTION OF THE
MOTION TO TRANSFER**

1 Luis Javier Vazquez and Dennis Lloyd
2 Hallman, on behalf of themselves and all
3 others similarly situated,

4 Plaintiffs,

5 v.

6 Zuffa, LLC, d/b/a Ultimate Fighting
7 Championship and UFC,

8 Defendant.

Case No. 5:14-cv-05591 EJD

9 Brandon Vera and Pablo Garza, on behalf of
10 themselves and all others similarly situated,

11 Plaintiffs,

12 v.

13 Zuffa, LLC, d/b/a Ultimate Fighting
14 Championship and UFC,

15 Defendant.

Case No. 5:14-cv-05621 EJD

16 Gabe Ruediger and Mac Danzig, on behalf of
17 themselves and all others similarly situated,

18 Plaintiffs,

19 v.

20 Zuffa, LLC, d/b/a Ultimate Fighting
21 Championship and UFC,

22 Defendant.

Case No. 5:15-cv-00521 EJD

1 Kyle Kingsbury and Darren Uyenoyama, on
2 behalf of themselves and all others similarly
situated,

3 Plaintiffs,

4 v.

5 Zuffa, LLC, d/b/a Ultimate Fighting
6 Championship and UFC,

7 Defendant.
8

Case No. 5:15-cv-01324 EJD

1 Plaintiffs Cung Le, Nathan Quarry, Jon Fitch, Luis Javier Vazquez, Dennis Lloyd
2 Hallman, Brandon Vera, Pablo Garza, Gabe Ruediger, Mac Danzig, Kyle Kingsbury, and Darren
3 Uyenoyama (collectively, “Plaintiffs”) and Defendant Zuffa, LLC d/b/a Ultimate Fighting
4 Championship and UFC (“Zuffa”), request that the Court enter the parties’ stipulation below
5 staying discovery pending the resolution of the Motion to Transfer.

6 WHEREAS Defendant Zuffa has filed a Motion to Dismiss and a Motion to Transfer
7 Venue Under 28 U.S.C. § 1404(a) in the above-entitled matters (*Le* Dkt. 31; Dkt. 64);

8 WHEREAS Plaintiffs have opposed those motions (*Le* Dkt. 69; Dkt. 71);

9 WHEREAS the Motion to Transfer venue is fully briefed and was argued and submitted
10 on May 7, 2015;

11 WHEREAS the Motion to Dismiss is fully briefed and is scheduled for argument on July
12 23, 2015;

13 WHEREAS the Defendant has moved to stay discovery pending the resolution of the
14 Motions to Transfer and Dismiss (*Le* Dkt. 87);

15 WHEREAS the Plaintiffs intend to oppose the Motion to Stay Discovery to the extent that
16 it would stay discovery pending resolution of the Motion to Dismiss;

17 WHEREAS the parties wish to conserve their own and judicial resources in resolving
18 these issues;

19 THE PARTIES STIPULATE AND AGREE AS FOLLOWS:

- 20 1. Discovery will be stayed pending the resolution of the pending Motion to Transfer;
- 21 2. Defendant’s Motion to Stay Discovery will be held in abeyance pending resolution of the
22 Motion to Transfer;
- 23 3. Once the Motion to Transfer is resolved, Plaintiffs may respond to the pending Motion to
24 Stay no later than 30 days after the Court’s order on the Motion to Transfer and Zuffa will
25 file its Reply no later than 14 days after Plaintiffs file their response;
- 26 4. If the action is transferred to the District of Nevada, the parties will rely on their existing
27 briefing on the Motion to Dismiss, rather than re-briefing the Motion, subject to
28 compliance with the District of Nevada’s Local Rules and, to the extent required, approval

of the Court in the transferee District. Nothing in this paragraph shall prevent either party from providing notices of supplemental authority or similar additional material to the Court to the extent permitted under the Federal Rules or any applicable Local Rule if circumstances warrant.

Dated: May 29, 2015

/s/ John F. Cove, Jr.

John F. Cove, Jr.
BOIES, SCHILLER & FLEXNER LLP
Counsel for Defendant Zuffa, LLC

Dated: May 29, 2015

/s/ Matthew S. Weiler

Joseph R. Saveri
Matthew S. Weiler
JOSEPH SAVERI LAW FIRM, INC.
Counsel for Plaintiffs

Pursuant to Local Rule 5.1(i)(3) I attest that all other signatories listed, and on whose behalf the filing is submitted concur in the filing's content and have authorized the filing.

Dated: May 29, 2015

By: /s/ John F. Cove, Jr.

John F. Cove, Jr.

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____, 2015

Honorable Edward J. Davila
United States District Judge